



Marjorie Hauf, Esq.  
Nevada Bar No.: 8111  
Matthew G. Pfau, Esq.  
Nevada Bar No.: 11439  
Cara Xidis, Esq.  
Nevada Bar No.: 11743  
H&P LAW  
710 South 9th Street  
Las Vegas, NV 89101  
702 598 4529 TEL  
702 598 3626 FAX  
e-file@courtroomproven.com  
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

**Courtney Cloud,**

Plaintiff,

vs.

**Allstate Indemnity Company;** Does 1  
through 10, inclusive, and Roe  
Corporations 1 through 10, inclusive,

Defendants.

Case No.: 2:23-cv-00468-JCM-DJA

**Stipulation and [Proposed] Order to  
Extend Deadlines  
(2<sup>nd</sup> Request)**

**IT IS HEREBY STIPULATED AND AGREED** by and between the parties hereto,  
by and through their respective counsel of record, that the discovery deadlines in  
this case be extended as follows:

**A. COMPLETED DISCOVERY**

1. Plaintiff has served her initial disclosures of witnesses and documents, and supplements thereto;
2. Defendant Allstate Indemnity Company has served their initial disclosures of witnesses and documents, and supplements thereto;
3. Plaintiff has propounded and answered written discovery requests;



4. Defendant Allstate Indemnity Company has propounded and answered written discovery requests;
5. Plaintiff has taken the deposition of Allstate Employee Sean Owens;
6. Plaintiff has taken the deposition of Allstate Employee Christine Fox;
7. Plaintiff has taken the deposition of Allstate Employee Jonathan Bourne;
8. Plaintiff has taken the deposition of Allstate Employee Rodney Farney;
9. Defendant has taken the deposition of Plaintiff Courtney Cloud;
10. Plaintiff has noticed the deposition of Allstate Employee Steven Peterson;
11. Defendant has noticed the depositions of Plaintiff's Experts;
12. Plaintiff and Defendant have disclosed their initial expert witnesses.

#### **B. OUTSTANDING DISCOVERY**

1. Deposition of the Allstate Indemnity Company's FRCP 30(b)(6) witness;
2. Depositions of expert witnesses;
3. Depositions of fact witnesses;
4. Disclosure of rebuttal expert witnesses;
5. Additional written discovery;
6. Disclosure of additional documents.

#### **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

Counsel for the parties have been diligent in conducting discovery but need additional time to disclose rebuttal expert reports. One of Plaintiff's initial experts is currently dealing with a family emergency which will make it difficult for him to complete his rebuttal disclosure by the deadline of April 8, 2024. Plaintiffs do not expect additional delays.

Therefore, there is good cause to extend the discovery deadline as requested. As such, the parties request a 30-day extension of the discovery deadlines.

**D. PROPOSED EXTENDED DEADLINES**

The parties have agreed to extend the discovery deadlines in this case, as follows:

	<b>CURRENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	Closed	Closed
Rebuttal expert disclosures	April 8, 2024	May 8, 2024
Close of Discovery	May 6, 2024	June 5, 2024
Dispositive motions	June 5, 2024	July 8, 2024
Pretrial Order	July 8, 2024	August 7, 2024, or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

Dated this 20th day of March, 2023.

H&P LAW

*/s/ Marjorie Hauf*

\_\_\_\_\_  
 Marjorie Hauf, Esq.  
 Nevada Bar No. 8111  
 Cara Xidis, Esq.  
 Nevada Bar No. 11743  
*Attorneys for Plaintiff*

Dated this 20th day of March, 2023.

KEATING LAW GROUP

*/s/ John Keating*

\_\_\_\_\_  
 John T. Keating, Esq.  
 Nevada Bar No. 6373  
*Attorney for Defendant*

**ORDER**

IT IS HEREBY ORDERED that following discovery deadlines shall be extended as follows:

	<b>NEW DEADLINE</b>
Motions to amend or add parties	Closed
Initial expert disclosures	Closed
Rebuttal expert disclosures	May 8, 2024
Close of Discovery	June 5, 2024
Dispositive motions	July 8, 2024
Pretrial Order	August 7, 2024



DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE

Submitted by:  
H&P Law

DATED: 3/22/2024

*/s/ Marjorie Hauf*

\_\_\_\_\_  
Marjorie Hauf, Esq.  
Nevada Bar No. 8111  
Cara Xidis, Esq.  
Nevada Bar No. 11743  
*Attorneys for Plaintiff*